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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re:  
  
REGAL PROPERTY HOLDINGS, INC.,  
  
Debtor.

Case No.: 13-13969-BTB  
Chapter 11  
Lead Case

In re:  
  
RICHARD NEILL TREVOR ROBERTS and  
JANE SHERIDAN ROBERTS,  
  
Debtors.

Case No. 13-13968-BTB  
Chapter 11  
Joint Administration With: 13-13969-BTB

**STIPULATION REGARDING RELIEF  
FROM THE AUTOMATIC STAY FOR  
PURPOSES OF PRELIMINARY  
INJUNCTION APPEAL**

*This Stipulation for Relief from the Automatic Stay for Purposes of Preliminary Injunction Appeal (the “**Stipulation**”) is entered into by and between Regal Property Holdings, Inc., Richard Neill Trevor Roberts, and Jane Sheridan Roberts (together, the “**Debtors**”), through their counsel of record, The Schwartz Law Firm, and Stirling Mortimer Global Property Fund PCC Limited (“**Stirling**” and, with the Debtors, the “**Parties**”), through its counsel of record, Parsons Behle & Latimer.*

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**RECITALS**

This Stipulation is made with reference to the following recitals:

1. Stirling initiated litigation against the Debtors in the United States District Court, District of Nevada (the “**District Court**”), entitled *Stirling Mortimer Global Property Fund PCC Limited v. Richard Neill Trevor Roberts, et al.*, case no.: 2:13-cv-00301-GMN-NJK, by filing a Verified Complaint on February 25, 2013.

2. Thereafter, Stirling moved for a preliminary injunction against the Debtors, which the District Court granted by Order dated May 3, 2013 (the “**Preliminary Injunction Order**”).

3. The Debtor filed for bankruptcy on May 6, 2013.

4. The Debtor timely filed a Notice of Appeal on May 8, 2013, appealing the Preliminary Injunction Order to the United States Court of Appeals for the Ninth Circuit (the “**Appeal**”). The Appeal has been docketed as Ninth Circuit Case No.: 13-15943.

5. On May 10, 2013, the Ninth Circuit filed a Clerk’s Order on the docket of the Appeal, requesting briefing from the parties regarding the effect of the automatic stay on the Appeal and staying all briefing in the Appeal pending further order of the Court of Appeals.

6. Both the Debtors and Stirling agree the resolution of the Appeal is important to both the litigation between the Parties and to the Debtors’ reorganization efforts.

7. The Parties further agree the Appeal should be allowed to proceed and the automatic stay should be modified to allow both the Debtors and Stirling to fully participate in the Appeal, and that such modification should be retroactive to the petition date.

**STIPULATION**

NOW THEREFORE, in consideration of the recitals made above, the undersigned Parties hereby stipulate and agree to the following and further request the Court enter an order (*see* Proposed Order, attached hereto as **Exhibit A**) approving the same:

1. The automatic stay applicable in these bankruptcy cases through 11 U.S.C. § 362(a) shall be modified to allow the Appeal to proceed and to allow both the

Debtors and Stirling to fully participate in the Appeal, and such modification shall be retroactive to the petition date.

2. The requirements contained within Rule 4001(a)(2) of the Federal Rules of Bankruptcy Procedure shall be waived and the relief granted by any order approving the Stipulation shall be effective immediately upon entry; and

3. The Court shall retain exclusive jurisdiction over the subject matter of this Stipulation in order to resolve any dispute in connection with the rights and duties specified herein.

STIPULATED AND AGREE TO BY:

Dated: May 16, 2013

/s/ Samuel A. Schwartz

Samuel A. Schwartz, Esq., NV Bar No. 10985

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*Proposed Attorneys for the Debtors*

Dated: May 16, 2013

/s/ J. Thomas Beckett

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